

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Case No. 22-CR-222 (NEB/TNL)

Plaintiff,

v.

**MOTION TO MODIFY
CONDITIONS OF RELEASE**

KHADAR JIGRE ADAN,

Defendant.

Defendant Khadar Jigre Adan, by and through his counsel William Mauzy, hereby requests this Court to enter an order modifying the conditions of his release to allow Defendant to correspond with co-defendants Liban Yasin Alshire and Ahmed Yasin Ali for the sole and limited purposes of managing the affairs of their joint businesses. If the present motion is granted, Defendant Adan will not discuss with his co-defendants any topics related to the criminal activity alleged in the indictment [Doc. 1]

In support thereof Defendant states as follows:

1. The Order Setting conditions of Release [Doc. 29] was entered September 22, 2022.
2. Defendant is currently being supervised by the U.S. Pretrial Services office.
3. Defendant is fully compliant with the conditions of his release.
4. One of the terms of Defendant's pretrial release (term g) is that he can have no contact with co-defendants in this case: Liban Yasin Alshire and Ahmed Yasin

Ali.

5. Defendant is the sole owner of the Jigjiga business center, located at 1516 E Lake St, Minneapolis Minnesota. He is the co-owner of several businesses that are located in that business center.
6. Among the businesses he co-owns is a kitchen (the Lake Street Kitchen), a Banquet Hall (Jigjiga Event Center), and an Adult Day Care Center (Lakes Adult Daycare). These three businesses are co-owned by Liban Yasin Alshire, a co-defendant in this case.
7. Ahmed Yasin Ali, another co-defendant, is also a co-owner of the Lake Street Kitchen.
8. It is extremely difficult if not impossible for Defendant or his agents to manage these businesses without regular contact with co-defendant Alshire and defendant Ali.
9. Defendant has significant health issues which now limit his ability to effectively operate these businesses by himself.
10. In connection with these health issues, Defendant's Son, Dahir Khadar Jigre, is taking his father's place as the new manager of these three businesses. In order to re-structure these businesses, and for administrative and tax-preparation purposes he needs to communicate on behalf of the Defendant, with Defendant Alshire and Defendant Ali regarding business records and transactions and the day-to-day operations of all three businesses, unrelated to the activities discussed in the indictment.

Date: November 10, 2022

Respectfully submitted,

By: /s/ William J. Mauzy
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